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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re Applications of

Robert B. Taylor  
Jupiter, Florida

For Renewal of Station WTRU (FM)

Jupiter Broadcasting Corp.  
Jupiter, Florida

For a Construction Permit

MM Docket No. 92-114

FCC File No. BRH-880926UJ

FCC File No. BPH-890103MD

To: Honorable Walter C. Miller  
Administrative Law Judge

**OPPOSITION TO FIRST PETITION TO ENLARGE ISSUES AGAINST ROBERT B. TAYLOR**

1. On May 22, 1992 Jupiter Broadcasting Corp. (JBC) filed a "First Petition to Enlarge Issues Against Robert B. Taylor (Taylor). By this Opposition, Taylor asks that the JBC petition be denied because the issues suggested by JBC are either not true or are of a frivolous nature or are not germane to this proceeding as follows:

2. PUBLIC FILE ISSUE. For reasons of security the WTRU public file was kept in Taylor's office at the radio station and was not accessible to all of Taylor's employees. Representatives of JBC inspected the WTRU public file in January 1989. Apparently they did not see the complete file that day because when they walked in, the station was off the air, the business office was closed, and Taylor was the only person there, in work clothes, cleaning the building. JBC knew that Taylor worked out of

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his Michigan office for much of the summer. So it deliberately picked July 1990 to again demand to inspect the public file, the second time in 18 months. Even though JBC had already arranged with Taylor, the licensee, to obtain copies of materials in the public file, JBC still proceeded to approach one of Taylor's employees directly and harass him with a personal visit, telephone calls and a federal express package. In its "First Petition," JBC includes a hearsay statement comprised of unsubstantiated allegations from a disgruntled former employee, Steve May, which is not notarized and therefore is not an affidavit. Although this undated statement was signed "Steve May," this is an alias, not the man's legal name.

JBC claims that "most of the documents required to be placed in the public file don't exist" (page 11, paragraph 13). Yet JBC in its own petition admits it received copies of most of the public file items.

In its Second Report and Order adopted March 1, 1984, the commission modified its rules by requiring commercial radio licensees to file issues/programs lists on a quarterly instead of an annual basis. During the two and a half year period of the license term that Taylor operated WTRU (September 18, 1984 through March 31, 1987), he was not aware of this rule change and continued to keep a master list that was added to at annual or more frequent intervals (Exhibit #1). Since this list was kept in a different file folder in Taylor's office, it was inadvertently overlooked when JBC requested public file data. In the entire time since Taylor began operating WTRU in 1984, the only requests received to see public file data were from JBC.

In this same two and a half year period, only one candidate (for

local public office) requested to purchase air time on WTRU. The contract for this purchase was kept in the station's contract files in the business office. No letters from the public were received during this period.

The Broadcast Equal Employment Opportunity Report, FCC Form 396, was filed with U.S. Three Broadcasting Corporation's WTRU renewal application on September 22, 1988 and was in the stations public file. It is unknown if a copy of this document was furnished to JBC. (See Exhibit #2.)

Taylor filed employment reports annually from 1986 through 1992. It is likely that he filed a report for 1985 as well, but to date a copy of it hasn't been located. Copies of these reports were kept in a separate envelope in the public file and apparently JBC was not provided access to them (except 1990).

3. PUBLIC FILE MISREPRESENTATION ISSUE. Taylor made no false statements. As explained above, during the two and half year period of the license term that Taylor operated WTRU (September 18, 1984 through March 31, 1987), Taylor was not aware that the commission had changed the rule in March 1984 and he continued to keep a master list that was added to at annual or more frequent intervals (Exhibit #1).

Under commission rules, an issues/programs list is not necessarily reflective of all the newscasts, public service announcements, on air interviews and other types of issue oriented programming a licensee may have broadcast. The commission does not require licensees to describe how they determined that each issue listed in its issues/programs list was one of concern to its community. In fact Taylor did broadcast issue oriented programming, much of which is documented in WTRU's official program logs.

4. FM SILENCE AUTHORITY ISSUES. As documented by JBC, Taylor kept WTRU silent for two years with full authorization in writing from the commission. WTRU was indeed kept silent under the doctrine that "causes beyond the control of a licensee make it impossible...to continue operating."

In paragraph 20 on page 15, JBC alleges that "On December 29, 1986 Robert Taylor began taking steps to turn off his Jupiter, Florida radio stations." I deny this allegation. That decision was not made until the end of March, 1987. The fact is four staffers were discharged in December 1986 for reasons relating to possible misconduct. JBC knows this because a detailed explanation concerning this was included in the WTRU public file and copies were provided to JBC. Yet JBC here is attempting to mislead the commission by making up the idea that these four staffers were actually fired because Taylor planned to take WTRU silent. JBC says Miss McKin suggests she was fired because "he was closing the station." I categorically deny making that statement. Miss McKin knows she was fired due to her involvement in the possible misconduct, because I told her that was why she and the other three were being discharged.

In reference to paragraph 31 on page 19, there are no facts establishing that "Taylor employed deceit," rather these are conclusions based on assumptions made by JBC that brings JBC to this startling accusation. JBC alleges that WTRU must have been off the air on March 26, 1987 because a process server allegedly came to the radio station on that date and later submitted a report that stated "the premises of the radio station appear(s) to be unused for a period of time." This

conclusion could have been made because the lawn needed mowing, the building needed paint and the door was locked. We routinely kept the front door locked because the building was across from a large field at the end of a dead-end dirt road, not in a business district. With a small staff it was a matter of securing the premises. However JBC implies that a) the process server's observation must be accurate, and b) WTRU (FM) must have been off the air because of the process servers statement. In fact, WTRU (FM) and the AM were both broadcasting that day and both stations were on the air daily through March 31, 1987. Therefore, there was no misrepresentation or lack of candor.

The July 28, 1988 letter from Taylor's legal counsel to the commission is completely true and honest. It clearly states that the "application has not yet been granted," which is true. WTRU made application for a construction permit to authorize its frequency change. The application was returned once due to a minor technical matter but was immediately refiled. So at that point the application had not yet been granted. Nevertheless, JBC alleges deceit. What deceit? There was none.

The reason WTRU (FM) was forced to be silent for as long as it was is because of the out-of-the-blue petition by WAOA (FM), Melbourne, Florida. In March, 1987, Silicon East Corporation, the licensee of WAOA (then WVTI-FM) petitioned the commission to change the table of assignments to order WTRU (then WKSX) to change to 99.5 instead of 107.1. The problem I faced was the station was operating on 96.7 at the time. To manufacture and install a new FM antenna would cost me \$20,000 to \$25,000. I would pay for it using the reimbursement money from WRFM,

95.7, Homestead, as directed by the commission. I could not afford to pay for buying and installing two new FM antennas within months of each other; one tuned to 107.1, then if the Melbourne petition prevailed, buy another one tuned to 99.5. I was never offered payment by the Melbourne licensee to buy a second antenna tuned to 99.5. So I took WTRU (FM) silent until the commission could decide which frequency I should ultimately use, 107.1 or 99.5. It was the only course of action any prudent person would take in similar circumstances.

5. AM SILENCE AUTHORITY ISSUES. This proceeding is about the license renewal of WTRU (FM). It has nothing to do with WEXI (AM), which was another, separate proceeding. Issues concerning WEXI (AM) should be added in a WEXI (AM) proceeding, not in this unrelated proceeding for license renewal of WTRU (FM).

In paragraph 43 on page 24, JBC alleges that Taylor "deceived the commission concerning his activities to return station WEXI (AM) to the air." JBC's allegation is simply false. All my statements to the commission on the telephone and in writing regarding WEXI were true and honest. JBC does not back up its charge. It fails to explain what Taylor did to deceive the commission.

6. LOCAL PUBLIC NOTICE ISSUE. The commission requires renewal applicants to broadcast public notice announcements both before and after the tendering of the application. WTRU (FM) did not broadcast these announcements because during the prescribed time frame in the autumn of 1988 WTRU was off the air awaiting installation of its new transmitting antenna. Obviously since no announcements were broadcast, there was nothing to put in the public file regarding this.

7. PUBLIC PROGRAMMING ISSUE. During the two and a half year period of the license term that Taylor operated WTRU, the station broadcast local and national (network) newscasts, programs dealing with financial issues, public service announcements, programs discussing health issues and interviews. For example, from September 1984 to September 1985 WTRU broadcast a thirty minute interview program every Saturday morning just before noon featuring health professionals and guests from Jupiter Hospital discussing health issues. The public service, public affairs and issue oriented programming which was broadcast is documented in WTRU's official program logs.

8. ENVIRONMENTAL MISREPRESENTATION ISSUE. In suggesting this issue, JBC is attempting to trick the commission by presenting a series of confusing statements and then drawing invalid conclusions.

In paragraph 52 on page 28 JBC accuses Taylor of making a false statement. On the contrary, Taylor's declaration was and is completely true and honest. JBC states: "The WEXI (AM) tower stood in an open field with unimpeded access." JBC's statement is the one that is false. The facts are as follows: WEXI had two towers, not one. From 1984 to the present day, both of these towers have been and are completely surrounded by five foot high chain link fences with three horizontal strands of barbed wire above the chain link, for a total height of about six feet. The metal chain link entrance gates are secured with padlocks. Yet JBC calls this "unimpeded access." Under the rules in effect at the time, these fences were completely adequate in meeting the requirement that humans would not be exposed to unsafe RF radiation levels.

Taylor's letter in January 1989 (page 28, paragraph 53) refers to the

commission's new requirements concerning ANSI guidelines. At the time that was written, Taylor was under the impression that the existing fences would have to be enlarged to take in a larger area around the AM towers in order to meet the new ANSI guidelines.

JBC's statement in paragraph 54 on page 28 is simply ridiculous: "Apparently Mr. Taylor has adapted his factual representations to the divergent results..." This sentence shows JBC fails to understand Taylor's fully honest actions, yet JBC is trying to cast doubt by offering its own inaccurate conclusions. The fact is there was no environmental misrepresentation.

9. RULEMAKING ABUSE ISSUE. JBC starts here with another of its conclusions which it states as being fact: "to avoid competition... Taylor had U.S. Three Broadcasting Corp. file a counterproposal" (paragraph 56, page 29). JBC doesn't say "we suspect that's why he did it," instead JBC just says "he did it."

Physically, channel 288A could have been allotted to any east coast community between Vero Beach and Jupiter, a distance of some 55 miles. Taylor carefully researched this area and concluded that White City was an underserved area that needed a new FM much more than Jupiter did.

In paragraph 57 on pages 29-30, JBC makes yet another unsubstantiated allegation with no attempt to back it up with facts: "Mr. Taylor's Jupiter stations had been silent for 18 months because of his financial inability to keep them operating." Where has it been shown or even suggested that WTRU was silent for reasons of "financial inability?"

In paragraph 58 on page 30, Kenneth Dawson continues his efforts to



discredit Taylor before the commission. Dawson was a very vindictive man who had approached Taylor demanding a job at WTRU. Taylor declined to hire Dawson and ever since Dawson has carried out a series of attacks on Taylor including having Dawson's friend and partner, Jose Oaks file a petition to deny. Dawson's allegation that the station's facilities were abandoned is baseless and untrue. Regarding Stephen Rowland's reply; he is simply wrong. There was no legal reason why U.S. Three could not apply for and operate channel 288A at White City.

JBC correctly states that U.S. Three indicated that it would "apply for a construction permit for a new station to operate on that channel (channel 288A, White City)..." However JBC fails to mention that the commission rejected U.S. Three's request to allot channel 288A at White City. Instead the commission decided to allot a different channel at White City, channel 284A. U.S. Three had not requested that channel 284A be allotted to White City. And U.S. Three did not indicate to the commission at any time that it intended to apply for channel 284A at White City. Therefore JBC's charge is without merit that Taylor "misrepresented facts, lacked candor and abused the commission's rule making process..."

Attempting to add this as an issue in the WTRU renewal proceeding shows that JBC is trying desperately to accuse Taylor of anything and everything it can possibly think of regardless of how baseless and unimportant JBC's charge is. In paragraph 60 on page 31, JBC continues to print allegations as if they were fact: "Mr. Taylor was unable to finance operation of his Jupiter, Florida stations..." This JBC statement is not a fact, it's an unproven allegation. "His claim that the Jupiter

stations were maintained was false." No, that statement by JBC is the one that is false. JBC offers nothing but a bold accusation here...no proof, no facts, no argument. Of course the stations were maintained.

10. FINANCIAL QUALIFICATIONS ISSUE. Here JBC lists several allegations as being facts including staff reductions in November 1990. The license period for which this renewal hearing is being held ended on February 1, 1989. Where is the relevance? What do staff changes nearly two years after the license period ended have to do with this?

In footnote 41 on page 32, JBC is telling the commission who was fired and why. JBC does not know and does not need to know how many people were fired, if any, and JBC does not know the reasons for certain individuals losing their jobs. They show no facts or proof, but that doesn't stop JBC from putting in this preposterous footnote, another allegation that JBC treats as fact. Their source is an undated, unnotarized statement signed by "Steve May" which is an alias, not the man's legal name.

JBC alleges that "at least some" staffers were not paid. Apparently "Steve May," a disgruntled former employee claims this, but who are the others of JBC's "some?" Where is JBC's proof? Although "Steve May" alleges the broadcast of Toby Arnold programs, Taylor denies it. However, in another attempt to mislead and confuse the commission, JBC states that Taylor did broadcast Toby Arnold programs. JBC doesn't say "it is alleged he did this," or "Taylor may have done this;" JBC states clearly "he did it." Again, JBC offers no proof for its allegation which has nothing to do with the issue they're trying to add anyway. It's just

another JBC attempt to smear Taylor's name and reputation.

In paragraph 63 on page 32, JBC mischaracterizes Taylor's relationship with Mr. Hernandez. The station's format change was made by Taylor, not Hernandez. Taylor did not cease financing WTRU's operations. Although the initial agreement with Hernandez provided for air time on WTRU to be leased to Hernandez, in no way did Taylor "simply lease the station" to Hernandez. Taylor's equipment at WTRU was used at all times. The air time lease was in effect for approximately three and a half months. A management contract with Hernandez began on April 20, 1991 and was terminated two months later. Again this normal and proper operating information about WTRU may be interesting reading but what bearing does it have on the license period which ended two and a half years earlier, the subject of this proceeding? In suggesting this as an issue, JBC shows no basis at all to indicate that Taylor is or may be financially unqualified.

11. RULE 73.3523 ISSUE. In paragraph 68 on page 33, JBC asserts that "Mr. Taylor's letter of December 9, 1991 was an offer to perjure himself to deceive the ... commission..." In fact it was nothing of the kind and JBC knows it. In the second paragraph of that letter, I was responding to Paul Levine's concerns about FCC settlement regulations which Mr. Levine and I had discussed in a telephone conversation. I told Mr. Levine in that phone call that I was aware of those regulations and would of course abide by them and I reiterated it in the letter when I clearly stated: "I don't think my November 18 business plan proposal is linked to an FCC settlement." I said this because my letters were

not settlement proposals, they were business operating proposals. Although JBC implies it, I did not suggest orally or in writing that we should enter into any agreement that would violate commission rules. I offered no payment. I offered no link between the business proposal and a settlement. In fact, my first letter, dated November 18, was simply an honest suggestion to join in a practical, workable business arrangement with absolutely no reference made to commission settlement regulations. The three page December 9 letter devotes just the second paragraph to a discussion of settlement regulations and the only reason I addressed it there at all was to respond to Mr. Levine's remarks on the phone. My concerns in that paragraph are reflective of the fact that since I knew this was not a settlement proposal, I didn't want it to be perceived as one. I should have realized that Mr. Levine was trying to trick me.

12. STRIKE THREAT ISSUE. About the time I wrote the letter of December 9, 1991 I had been told that someone named Potamkin was the real-party-in-interest behind JBC's application. I did not know who this person was or how or if this person was tied to JBC. I didn't even know "Potamkin's" first name.

About a month later I discovered that there were three Potamkins... an Alan, a Robert and a Victor. I was subsequently informed about January 9, 1992 that it was Alan who had the connection with JBC. At my request I attended a meeting in Miami on January 20, 1992 in which Paul Levine and Matthew Leibowitz were both present. I asked for that meeting so that I could ask if it was true that it was Alan Potamkin that had a connection with JBC. I sat across the table from Mr. Levine

and Mr. Leibowitz and asked each of them about Mr. Potamkin's involvement. Both men in turn looked at me and firmly denied that Alan Potamkin had any connection with JBC, hidden or not. Both men lied.

Although I suspected it as early as January 9, 1992 and wrote to Mr. Potamkin in Miami at that time, I did not know until June 2, 1992, the day I received JBC's "First Petition to Enlarge Issues Against Robert B. Taylor," that Alan Potamkin did in fact have a direct connection with JBC. I found that out by reading paragraph 69 on page 34 where JBC states "Alan H. Potamkin holds an option to purchase non-voting stock in JBC." This is how I know now that I was lied to on January 20, 1992 by Paul Levine and Matthew Leibowitz.

As described above, I did not find out until June 2, 1992 that Alan Potamkin was linked to JBC. This is because I have never had access to JBC corporate documents. Up until now JBC has deliberately concealed the fact that Alan Potamkin was the real-party-in-interest.

There is no strike issue because there was no strike threat. I did not threaten anyone including Mr. Potamkin. My letter was not as JBC alleges in paragraph 71 on page 35, a threat "calculated to have the maximum impact on settlement." What settlement? There was no settlement and there were no settlement discussions. In fact there was no contact at all between Taylor and JBC after the December 9 letter until a month later, well after the deadline for filing for Florida television stations.

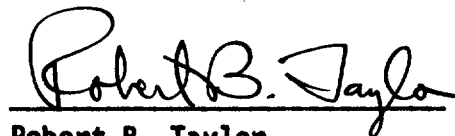
13. PAST BROADCAST RECORD ISSUE. This issue is not an issue at all. In this paragraph JBC just repeats all the allegations and accusations that it presented earlier and tells the commission that these are now facts, because JBC says they are. Taylor has an excellent past broadcast record, not a poor one.

14. INEPTNESS ISSUE. In this rehash of earlier stated charges, JBC is trying desperately to find something else that they can use to try to discredit Taylor. Taylor has demonstrated in this Opposition that he is a responsible and honest broadcaster and citizen.

15. FORFEITURE NOTICE. In all my interaction with the commission over the years I have been and continue to be totally honest and straightforward, yet JBC insists on accusing me of making misrepresentations or other misconduct. Everything alleged here by JBC has been responded to in this Opposition. This is not an issue. There is no basis for any forfeiture.

16. CONCLUSION. JBC has failed to show that its list of suggested issues has validity, therefore, by this Opposition, Taylor requests that the JBC "First Petition to Enlarge Issues Against Robert B. Taylor" be denied.

Respectfully submitted,

A handwritten signature in cursive script that reads "Robert B. Taylor". The signature is written in dark ink and is positioned above a horizontal line.

Robert B. Taylor  
Licensee, WTRU (FM)

June 12, 1992

Robert B. Taylor  
500 N. Delaware Blvd. #1  
Jupiter, FL 33458  
(407) 744-6398

Unforgettable

**WVSI** AM/FM  
Radio

## "THE STATION OF THE STARS"

### ISSUES PROGRAM LISTS:

CLEANUP OF JONES CREEK  
TRAFFIC ON INDIANTOWN ROAD / BUILDING OF I-95 INTERCHANGE  
SUNRISE COLLAPSE - LOSS OF FUNDS FOR PAUL THOMPSON'S CALLE ~~VIEJA~~ VIEJO PROJECT  
FPL WIRE ELECTROCUTION OF 7 PEOPLE IN TROY HULKS FAMILY  
ON 3-22-85 IN JUPITER.  
JUPITER INLET DISTRICT - REQUESTS FOR SOFTBALL FIELDS  
SPEEDBOATS KILLING MANATEES  
WIDENING OF INDIANTOWN ROAD  
NEW BRIDGE OVER INTRACOASTAL AT INDIANTOWN ROAD  
COMPETING IN BED RACE IN JUPITER FOR CHARITY - SUMMER 1986  
AFTERMATH OF DEATH OF DAUGHTER OF SCHOOL BOARD MEMBER  
GAIL BJORK IN CAR ACCIDENT ON CENTER STREET  
ELECTION OF TOM LEWIS TO CONGRESS  
BUSINESS PROBLEMS OF MAYOR MARY HINTON

**BROADCAST EQUAL EMPLOYMENT  
OPPORTUNITY PROGRAM REPORT**

(To be filed with broadcast license renewal application)

Call Letters WKSJ (FM)

(For FCC Use Only)

Code No.

Name of Licensee U.S. Three Broadcasting Corporation  
City and State which station  
is licensed to serve Jupiter, Florida

**TYPE OF BROADCAST STATION (Check one)**

Commercial Broadcast Station

Noncommercial Broadcast Station

☐ AM

☐ TV

☐ Educational Radio

☒ FM

☐ Low Power TV

☐ Educational TV

☐ Combined AM & FM  
in same area

☐ International

**SEND NOTICES AND COMMUNICATIONS TO THE FOLLOWING NAMED PERSON AT THE ADDRESS INDICATED BELOW:**

Name <b>U.S. Three Broadcasting Corporation</b>	Street Address <b>500 N. Delaware Blvd.</b>		
City <b>Jupiter</b>	State <b>Florida</b>	ZIP Code <b>33458</b>	Telephone No. <b>(407) 746-5191</b>

**FILING INSTRUCTIONS**

Broadcast station licensees are required to afford equal opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, national origin, and sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics). If minority group representation in the available labor force is less than five percent (in the aggregate), equal employment opportunity (EEO) program information for minority group members need not be filed. However, EEO program information must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant employs fewer than five full-time employees, no equal employment opportunity activity information need be filed.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in license renewal being delayed or denied. These requirements are contained in Section 73.2080 of the FCC Rules (47 CFR 73.2080), and are authorized by the Communications Act of 1934, as amended.

☒ If your station employs fewer than five full-time employees, check the box at left, complete the certification below, return the form to the FCC, and place a copy in your station's public file. You do not have to complete the rest of the form.

**If your station employs five or more full-time employees, you must complete all of this form and follow all instructions.**

☐ If minority group representation in the available labor force is less than 5 percent (in the aggregate) and you choose not to file EEO program information for minority groups, check the box at left and complete the rest of this form with only the information for your program directed towards women.



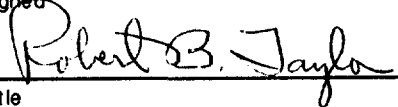
# CERTIFICATION

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.**

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed 
Title President
Date September 22, 1988
Name of Respondent U.S. Three Broadcasting Corp.
Telephone No. (include area code) (407) 746-5191

## FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the license renewal requested is consistent with the public interest. The staff, consisting variously of attorneys, accountants, engineers, and applications examiners, will use the information to determine whether the license renewal application should be granted, denied, dismissed or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

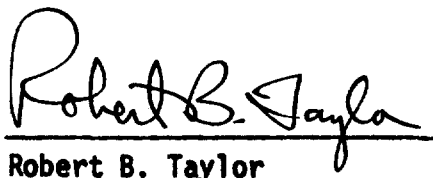
**THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.**

CERTIFICATE OF SERVICE

I, Robert B. Taylor, hereby certify that the attached Opposition to First Petition to Enlarge Issues Against Robert B. Taylor, submitted on my behalf, was sent the 15th day of June, 1992 to the following persons by U.S. mail, first class postage prepaid, or in the case of the commission, was sent by Federal Express or hand delivered:

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

Joseph A. Belisle  
Leibowitz & Spencer  
1 SE Third Ave., Suite 1450  
Miami, FL 33131

  
Robert B. Taylor